

WHITE & CASE LLP
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Counsel for SRM Global Master Fund Limited Partnership

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	Chapter 11 Case No.
	:	08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	(Jointly Administered)
Debtors.	:	
	:	

**DECLARATION OF RICHARD A. GRAHAM IN SUPPORT OF
SRM GLOBAL MASTER FUND LIMITED PARTNERSHIP'S LIMITED
OBJECTION TO PLAN ADMINISTRATOR'S MOTION TO ESTIMATE
CLAIMS FOR RESERVE AND DISTRIBUTION PURPOSES**

I, Richard A. Graham, make the following declaration pursuant to 28 U.S.C. §1746:

1. I am an attorney admitted to practice law before the courts of the State of New York and the United States District Court for the Southern District of New York and am an associate with the law firm of White & Case LLP, counsel for SRM Global Master Fund Limited Partnership ("SRM"). I make this Declaration based upon my personal knowledge and upon documents supplied to me by SRM and other attorneys at White & Case LLP.
2. Attached hereto as Exhibit A is a copy of the Guarantee of Lehman Brothers Holdings Inc. (London Branch) dated May 12, 2008.

3. Attached hereto as Exhibit B is a copy of the Unanimous Written Consent of the Executive Committee of the Board of Directors of Lehman Brothers Holdings Inc. dated June 9, 2005.

4. Attached hereto as Exhibit C is a copy of [REDACTED]
[REDACTED]
[REDACTED]

5. Attached hereto as Exhibit D is a copy of [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6. Attached hereto as Exhibit E is a copy of the Schedule to the Master Agreement dated May 12, 2008 between Lehman Brothers International (Europe) and SRM Fund General Partner Limited, in its capacity as general partner of, and acting on behalf of, SRM.

7. Attached hereto as Exhibit F is a copy of the ISDA Master Agreement dated May 12, 2008 between Lehman Brothers International (Europe) and SRM Fund General Partner Limited, in its capacity as general partner of, and acting on behalf of, SRM and a copy of the Form of ISDA Master Agreement 1992 (Multicurrency – Cross Border).

I declare under the penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: New York, New York
July 10, 2015

By: /s/ Richard A. Graham

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